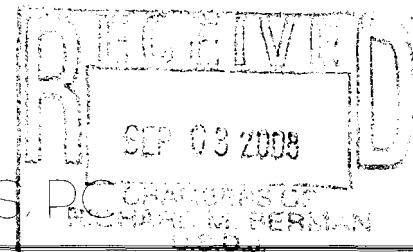


Neil H.
Greenberg



and
ASSOCIATES



900 MERCHANTS CONCOURSE, SUITE 214, WESTBURY, NEW YORK 11590

NEIL H. GREENBERG
JUSTIN M. REILLY*

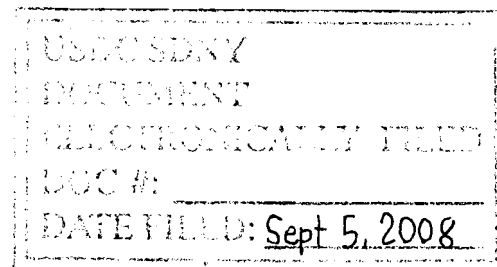
ROSA GUARINO-PARALEGAL

* ADMITTED IN N.Y. & C.T.

September 2, 2008

VIA: Federal Express

The Honorable Justice Richard M. Berman
United States District Judge
United States District Court, Southern District of New York
500 Pearl Street
New York, NY 10007



RE: Ashe et al. v. Franklin First Financial, LTD.
08 CV 1585 (RMB)(HP)

Honorable Sir:

MEMO ENDORSED
p. 2

This office represents the defendant in the above action.

Please accept this correspondence as a request for an extension of time in which to complete discovery in this matter.

The Court's original Case Management Plan sets the discovery completion date for October 1, 2008.

The parties have been and continue to actively conduct discovery, but will not be finished by the deadline set forth in the Case Management Plan.

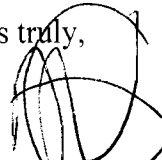
There are twenty-four depositions scheduled for the month of October, 2008. While the parties hope to complete all of these depositions in October, 2008, some of them may take place in November, 2008 due to scheduling conflicts.

There have been no previous requests for an extension of time to complete discovery and the plaintiffs' counsel consents to the requested extension.

I have enclosed a proposed Revised Case Management Plan for the Court's review and approval.

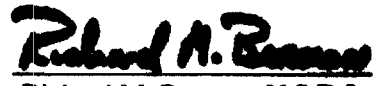
Thank you for your time and attention to this matter.

Yours truly,



Neil H. Greenberg (NG 1307)

cc: Paul Rooney, Esq. by federal express

<u>An extension to 11/17/08 is granted.</u>	
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SO ORDERED: Date: <u>9/4/08</u>	 Richard M. Berman, U.S.D.J.